

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

TRANSACTION HOLDINGS LTD. L.L.C.,	:	
	:	
Plaintiff,	:	
v.	:	Civil Action No. 06-43 (SLR)
	:	
IYG HOLDINGS CO., 7-ELEVEN, INC., VCOM	:	<b>JURY TRIAL DEMANDED</b>
FINANCIAL SERVICES, INC.,	:	
	:	
Defendants.	:	
	x	

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**PLAINTIFF TRANSACTION HOLDINGS LTD.  
L.L.C.'S REPLY TO DEFENDANTS' COUNTERCLAIM**

Plaintiff Transaction Holdings Ltd. L.L.C. (hereinafter "Transaction Holdings"), pleads as follows in response to defendants' IYG Holding Co., 7-Eleven, Inc., and Vcom Financial Services, Inc.'s (collectively "defendants") counterclaims as set forth in paragraphs 19-23 of Defendants Answer, Defenses and Counterclaims:

19. Transaction Holdings admits that defendants' counterclaim is purportedly brought pursuant to 28 U.S.C. §§ 1338(a), 2201, and/or 2202 and that this Court has subject matter and jurisdiction to hear and decide this counterclaim.

20. Transaction Holdings denies that the patent-in-suit is invalid for failure to meet the conditions of Title 35 of the United States Code, including, but not limited to, 35 U.S.C. §§ 102, 103, and 112.

21. Transaction Holdings denies that the patent-in-suit is invalid in view of the prior art pursuant to 35 U.S.C. §§ 102 and 103.

22. Transaction Holdings denies that the defendants have not infringed any valid claim of the patent-in-suit.

23. Transaction Holdings denies that for the defendants this case is an exceptional case under 35 U.S.C. § 285 and denies that defendants are entitled to an award under 35 U.S.C. § 285.

WHEREFORE, Transaction Holdings prays for the following relief:

A. An order dismissing defendants' counterclaims with prejudice and denying the relief requested in such counterclaims.

B. An award of attorney fees and costs associated with Transaction Holdings' responses to defendants' counterclaims, including attorney fees and costs available pursuant to 35 U.S.C. § 285; and

C. Such other and further relief as this Court deems necessary and just.

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Arthur G. Connolly, III

Arthur G. Connolly, III (#2667)

The Nemours Building

1007 North Orange Street

Wilmington, DE 19801

Tel: 302.658.9141

Fax: 302.658.5614

*Attorneys for Plaintiff*

*Transaction Holdings Ltd. L.L.C.*

OF COUNSEL:

Joseph S. Littenberg

Stephen F. Roth

Kevin M. Kocun

LERNER, DAVID, LITTENBERG,

KRUMHOLZ & MENTLIK, LLP

600 South Avenue West

Westfield, NJ 07090-1497

Tel: 908.654.5000

Fax: 908.654.7866

Dated: October 9, 2006

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 9, 2006, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following counsel of record:

Richard L. Horwitz, Esq.  
David E. Moore, Esq.  
Potter Anderson & Corroon LLP  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801

I FURTHER CERTIFY that on October 9, 2006, I have Electronically Mailed the foregoing document to the following non-registered participants:

Eric J. Lobenfeld, Esq.  
Ira J. Schaefer, Esq.  
Arun Chandra, Esq.  
Huangyong Gao, Esq.  
Hogan & Hartson LLP  
875 Third Avenue  
New York, NY 10022  
[ejlobenfeld@hhlaw.com](mailto:ejlobenfeld@hhlaw.com)  
[ijschaefer@hhlaw.com](mailto:ijschaefer@hhlaw.com)  
[achandra@hhlaw.com](mailto:achandra@hhlaw.com)  
[hgao@hhlaw.com](mailto:hgao@hhlaw.com)

/s/Arthur G. Connolly, III  
Arthur G. Connolly, III (#2667)